

PUBLIC NOTICE

**Mundet Tennessee, Inc.**, has applied to the Tennessee Air Pollution Control Division (TAPCD) for renewal of a major source operating permit subject to the provisions of paragraph 1200-03-09-.02(11) of the Tennessee Air Pollution Control Regulations (also frequently referred to as Title V regulations). A major source (Title V) operating permit is required by both the Federal Clean Air Act and the Tennessee Air Pollution Control Regulations.

The applicant is **Mundet Tennessee, Inc.**, with a site address of 170 Geiger Road, Surgoinville, Tennessee. They seek to obtain renewal of a major source operating permit for their rotogravure printing and waste paper handling facility.

EPA has agreed to treat this draft Part 70 permit as a proposed Part 70 permit and to perform its 45-day review provided by the law concurrently with the public notice period. If any substantive comments are received, EPA's 45-day review period will cease to be performed concurrently with the public notice period. EPA's 45-day review period will start once the public notice period has been completed and EPA receives notification from the Tennessee Air Pollution Control Division the comments have been received and resolved. Whether EPA's 45-day review period is performed concurrently with the public notice comment period or after the public comment period has ended, the deadline for citizen's petition to object to the EPA Administrator will be determined as if EPA's 45-day review is performed after the public comment period has ended (i.e., sequentially).

The status regarding EPA's 45-day review of this project and the deadline for submitting a citizens' petition can be found at the following website address: <http://www2.epa.gov/caa-permitting/caa-permitting-epas-southeastern-region>

A copy of the application materials used by the TAPCD and a copy of the draft permit are available for public inspection during normal business hours at the following locations:

Clyde W. Roddy Library  
Kay B. Madewell, Director  
371 1st Avenue  
Dayton, Tennessee 37321

and                      Tennessee Department of Environment and Conservation  
Division of Air Pollution Control  
William R. Snodgrass Tennessee Tower  
312 Rosa L. Parks Avenue, 15<sup>th</sup> Floor  
Nashville, TN 37243

Also, if you require a copy of the draft/proposed permit it is available electronically by accessing the Air Pollution Control Public Participation Opportunity (APC PPO) page: <http://www.tn.gov/environment/topic/ppo-air>

Interested parties are invited to review these materials and comment. In addition, a public hearing may be requested at which written or oral presentations may be made. To be considered, written comments or requests for a public hearing must be made within thirty (30) days of the date of this notice and should be addressed to **Michelle Walker Owenby, Director, Division of Air Pollution Control, William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue, 15<sup>th</sup> Floor, Nashville, Tennessee 37243**. Questions concerning the source(s) may be addressed to Mr. Doug Wright at the same address or by calling (615)-532-0583 or emailing to [Doug.s.wright@tn.gov](mailto:Doug.s.wright@tn.gov). A final determination will be made after weighing all relevant comments.

Individuals with disabilities who wish to participate should contact the Tennessee Department of Environment and Conservation to discuss any auxiliary aids or services needed to facilitate such participation. Such contact may be in person, by writing, telephone, or other means, and should be made no less than ten days prior to the end of the public comment period to allow time to provide such aid or services. Contact the Tennessee Department of Environment and Conservation ADA Coordinator, W.R. Snodgrass Tenn. Tower, 312 Rosa L. Parks Ave. 2nd Floor, Nashville, TN 37243, 1-866-253-5827. Hearing impaired callers may use the Tennessee Relay Service, 1-(800)-848-0298.

(Do not publish text below the dotted line)

-----

For the Hawkins County "Rogersville Review"-- publish once between November 14 and 30, 2017

Assigned to –Doug Wright, Air Pollution Control

**No alterations to the above are allowed:**

**Mundet Tennessee, Inc., must pay to place this advertisement in the newspaper.**

Air Pollution Control must be furnished with an affidavit from the newspaper stating that the ad was run and the date of the ad or one complete sheet from the newspaper showing this advertisement, the name of the newspaper and the date of publication. Mail to Doug Wright, Air Pollution Control Division, William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue, 15<sup>th</sup> Floor, Nashville, Tennessee 37243 or send a pdf copy of this information electronically to [air.pollution.control@tn.gov](mailto:air.pollution.control@tn.gov).

## **TITLE V PERMIT STATEMENT**

<b>Facility Name:</b> <a href="#">Mundet Tennessee, Inc.</a>
<b>City:</b> <a href="#">Surgoinsville</a>
<b>County:</b> <a href="#">Hawkins</a>
<b>Date Application Received:</b> <a href="#">October 3, 2016</a>
<b>Date Application Deemed Complete:</b> <a href="#">October 3, 2016</a>
<b>Emission Source Reference No.:</b> <a href="#">37-0076</a>
<b>Permit Nos.:</b> <a href="#">572143</a>

## **INTRODUCTION**

This narrative is being provided to assist the reader in understanding the content of the attached Title V operating permit. This Title V Permit Statement is written pursuant to Tennessee Air Pollution Control Rule 1200-03-09-.02(11)(f)1.(v). The primary purpose of the Title V operating permit is to consolidate and identify existing state and federal air requirements applicable to [Mundet Tennessee, Inc.](#) (MTI) and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the Title V Operating Permit. It initially describes the facility receiving the permit, then the applicable requirements and their significance, and finally the compliance status with those applicable requirements. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public participation process will be described in an addendum to this narrative.

## **Acronyms**

PSD	-	Prevention of Significant Deterioration
NESHAP	-	National Emission Standards for Hazardous Air Pollutants
NSPS	-	New Source Performance Standards
MACT	-	Maximum Achievable Control Technology
NSR	-	New Source Review

## I. Identification Information

### A. Source Description

List and describe emission source(s): **37-0076 Mundet Tennessee, Inc.**

Graphic Arts Manufacturing Plant; 40 CFR 60 (NSPS) Subpart QQ, 40 CFR 63 (MACT) Subpart KK Area Source

37-0076-01: Rotogravure printing process No. 28, ink hose tank, floor mopping and press cleanup (previously permitted as 37-0076-01); Rotogravure printing press No. 29 (previously permitted as 37-0076-05); Rotogravure printing press No. 30 (New Equipment per this modification). Two (2) regenerative thermal oxidizers (RTO #1 and RTO #2) operating in parallel for control of VOC and Organic HAP emissions.

37-0076-02: Waste paper handling operation with baler and cyclone with baghouse emission control.

### B. Facility Classification

1. Attainment or Non-Attainment Area Location: Area **is** designated as an **attainment** area for all criteria pollutants.
2. Class I or Class II area: Company **is** located in a **Class II** area.

### C. Regulatory Status

1. PSD/NSR: This facility **is not** a major source under **PSD**.
2. Title V Major Source Status by Pollutant

Pollutant	Is the pollutant emitted?	If emitted, what is the facility's status?	
		Major Source Status	Non-Major Source Status
PM	Yes	No	Yes
PM <sub>10</sub>	N/A	N/A	N/A
SO <sub>2</sub>	Yes	No	Yes
VOC	Yes	Yes	No
NO <sub>x</sub>	Yes	No	Yes
CO	Yes	No	Yes
CO <sub>2</sub> e (GHG)	Yes	No	Yes
Individual HAP	Yes	No	Yes
Total HAPs	Yes	No	Yes

3. MACT Standards: This facility **is NOT** a major source for HAPs. This facility **is** subject to a proposed or final MACT Standard.

List MACT Rule(s) if applicable:

4. Program Applicability: Are the following programs applicable to the facility?

PSD **No**

NESHAP **Yes, area source of HAP**

NSPS **Yes**

## II. Compliance Information

A. Compliance Status:

Is the facility currently in compliance with all applicable requirements? **yes**

If no, explain.

B. Are there any applicable requirements that will become effective during the permit term? **no**

If yes, explain.

## III. Other Requirements

A. Emissions Trading: *The facility **is not** involved in an emission-trading program.*

B. Acid Rain Requirements: This facility **is not** subject to any requirements in Title IV of the Clean Air Act.

C. Prevention of Accidental Releases: **Not Applicable**

## IV. Public Participation Procedures

Notification of this draft permit was mailed to the following environmental agencies:

A. U.S. EPA Region IV

B. State of Kentucky

C. State of North Carolina, Division of Air Quality

D. State of Virginia

E. Johnson City Environmental Field Office

## V. Title V Permit History

**Permitting activities since original permit issuance (Previous Title V Permit 553946)**

1. A significant modification to title V permit 553946 was required because of a significant emission increase. New ownership requested to add a printing line which resulted in the VOC emission increase of more the 40 TPY. After the increase, the facility is under the

classification of major source for PSD purposes. The significant modification was issued February 12, 2008.

2. The control device (catalytic oxidizer) underwent complete replacement. With the addition of the printing line and control device replacement, VOC emissions are controlled by two regenerative thermal oxidizers. New compliance assurance methods and techniques were applied since the facility is subject to specific requirements for NSPS control device equipment.
3. Changes also included two administrative amendment (AA) requests that came in during the significant modification process. One AA is for ownership change and the other is for responsible official name change. Since these were included with the significant modification, the same issue date applies.

#### **Permit renewal changes**

1. On June 27, 2005, there was a minor modification to title V permit 553946 (issued May 26, 2005) changing conditions related to source 37-0076-02 (waste paper handling operations).
2. Title V permit 553946 expired and this permit is a renewal with revised requirements and conditions.
3. The renewal includes an administrative amendment to change the responsible official. It also includes a minor modification request where a control device has been changed (cyclone to baghouse exhausting inside the building for source 37-0076-02).
4. The renewal includes a second operating scenario where bypassing emission control equipment is allowed because of low VOC concentration to the RTO. The second scenario provides details in which one press uses water based coatings (inks) with very little VOC.

#### **Minor Modification #1 change to 563209**

1. On June 25, 2015, MTI installed a new caustic cleaning operation with ink-jet printing. Both operations are insignificant. Press Number 27 was shut down and removed in 2009, so there will be a new VOC permitted limit of 199 tons per year. This puts the facility in a lower fee bracket below 250 tons per year.
2. Permit Conditions A12, E2, E3-2, E3-3, E3-5, E3-8, E3-9, E4-2, E4-6, E4-9, and E4-11 were updated. The facility description on page 14 and the source description on page 20 were also updated.

#### **Administrative Amendment #1 to 563209**

1. Permit was amended to fix several typographical errors in Condition E2-1 related to the relevant responsible officials.
2. Condition E2b was updated with new permitting language.

#### **Permit renewal changes to 572143**

1. Responsible official as changed to Ms. Carol A. Rod, General Manager, with an update from the permittee dated 05/30/2017. See Condition E2-1
2. Table of contents was simplified.
3. Condition E1 was updated.
4. Condition E2(a) was made more general.
5. The compliance assurances for Conditions E4-2 through E4-6 were updated.

AIR POLLUTION CONTROL BOARD  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
NASHVILLE, TENNESSEE 37243



**OPERATING PERMIT (TITLE V) Issued Pursuant to Tennessee Air Quality Act**

This permit fulfills the requirements of Title V of the Federal Clean Air Act (42 U.S.C. 7661a-7661e) and the federal regulations promulgated thereunder at 40 CFR Part 70. (FR Vol. 57, No. 140, Tuesday, July 21, 1992 p.32295-32312). This permit is issued in accordance with the provisions of paragraph 1200-03-09-.02(11) of the Tennessee Air Pollution Control Regulations. The permittee has been granted permission to operate an air contaminant source in accordance with emissions limitations and monitoring requirements set forth herein.

**Date Issued:** Draft **Permit Number:** 572143

**Date Expires:** Draft

<b>Issued To:</b> Mundet Tennessee, Inc.	<b>Installation Address:</b> 170 Geiger Road Surgoinsville
---	--

**Installation Description:**

Graphic Arts Manufacturing Plant; 40 CFR 60 (NSPS) Subpart QQ, 40 CFR 63 (MACT) Subpart KK Area Source  
37-0076-01: Rotogravure printing process No. 28, ink hose tank, floor mopping and press cleanup; Rotogravure printing press No. 29; Rotogravure printing press No. 30; Two (2) regenerative thermal oxidizers (RTO #1 and RTO #2) operating in parallel for control of VOC and Organic HAP emissions.  
37-0076-02: Waste paper handling operation with baler and cyclone and baghouse for emissions control.

**Emission Source Reference No.:** 37-0076

<b>Renewal Application Due Date:</b> Between 180 and 270 days before permit expiration	<b>Primary SIC:</b> 27
---	------------------------

**Information Relied Upon:**

CAM Plan dated: March 15, 2010  
Title V Permit 563209 issued June 12, 2009  
Responsible Official change notification dated: May 30, 2017  
Renewal Application dated: October 2, 2016  
Agreement letter dated October 23, 2007

(continued on the next page)

TECHNICAL SECRETARY

No Authority is Granted by this Permit to Operate, Construct, or Maintain any Installation in Violation of any Law, Statute, Code, Ordinance, Rule, or Regulation of the State of Tennessee or any of its Political Subdivisions.

**POST AT INSTALLATION ADDRESS**

CN-0827 (Rev.2-13)

RDA-1298

---

## CONTENTS

---

### SECTION A

---

#### GENERAL PERMIT CONDITIONS

---

A1. Definitions	
1	
A2. Compliance requirement	
1	
A3. Need to halt or reduce activity	
1	
A4. The permit	1
A5. Property rights	1
A6. Submittal of requested information	
1	
A7. Severability clause	
1	
A8. Fee payment	
2	
A9. Permit revision not required	
3	
A10. Inspection and entry	
3	
A11. Permit shield	
3	
A12. Permit renewal and expiration	
4	
A13. Reopening for cause	
4	
A14. Permit transference	
5	
A15. Air pollution alert	
5	
A16. Construction permit required	
5	
A17. Notification of changes	
5	
A18. Schedule of compliance	
5	
A19. Title VI	6
A20. 112 (r)	
6	

---

### SECTION B

---

#### GENERAL CONDITIONS for MONITORING,

---

---

## REPORTING, and ENFORCEMENT

---

B1.	Recordkeeping	7
B2.	Retention of monitoring data	
7		
B3.	Reporting	7
B4.	Certification	
7		
B5.	Annual compliance certification	
7		
B6.	Submission of compliance certification	
8		
B7.	Emergency provisions	8
B8.	Excess emissions reporting	
8		
B9.	Malfunctions, startups and shutdowns - reasonable measures	
required	9	
B10.	Reserved	9
B11.	Report required upon the issuance of notice of violation for	
excess emissions	9	

---



---

## CONTENTS

---

### SECTION C

---

#### PERMIT CHANGES

---

C1.	Operational flexibility changes	
9		
C2.	Section 502(b)(10) changes	
9		
C3.	Administrative amendment	
9		
C4.	Minor permit modifications	
9		
C5.	Significant permit modifications	
10		
C6.	New construction or modifications	
10		

---

### SECTION D

---

#### GENERAL APPLICABLE REQUIREMENTS

---

D1.	Visible emissions	
	11	
D2.	General provisions and applicability for non-process gaseous emissions	
	11	
D3.	Non-process emission standards	
	11	
D4.	General provisions and applicability for process gaseous emissions	
	11	
D5.	Particulate emissions from process emission sources	
	11	
D6.	Sulfur dioxide emission standards	
	11	
D7.	Fugitive dust	
	11	
D8.	Open burning	
	12	
D9.	Asbestos	12
D10.	Annual certification of compliance	
	12	

---

---

## CONTENTS

---

### SECTION E

---

#### SOURCE SPECIFIC EMISSION STANDARDS, OPERATING LIMITATIONS, and MONITORING, RECORDKEEPING and REPORTING REQUIREMENTS

---

E1.	Fee payment: .....	17
E2.	Reporting requirements.....	20
	(a) Semiannual reports.....	20
	(b) Annual compliance certification.....	20
E2-1.	.....	Identif
	ication of Responsible Official, Technical Contact, and Billing Contact.....	17
E3.	General Permit requirements.....	21
E3-1.	.....	Subpart
	QQ requirements.....	22
E3-2.	VOC and HAP containing material requirements ..	18
E3-3.	.....	Subpart
	KK area source declaration.....	23
E3-4.	.....	Hazardo
	us Air Pollutant (HAP) limitation.....	24
E3-5.	.....	Facilit
	y Volatile Organic Compounds (VOC) limitation..	24
E3-6.	.....	Working
	condition of VOC control equipment.....	24
E3-7.	.....	Data
	requirements.....	24
E3-8.	.....	Visible
	emissions restriction.....	25
E3-9.	.....	Insigni
	ficant activities.....	20
E4.	Conditions specific to source 37-0076-01. ....	26
E5.	Conditions specific to source 37-0076-02. ....	33

**END OF PERMIT NUMBER 572143**

26

---

#### ATTACHMENT 1 Opacity Matrix Decision Tree for Visible Emission Evaluation by

**EPA Method 9, dated June 18, 1996, as amended on September 11, 2013**

**1 page**

---

**ATTACHMENT 2 CAM Plan Revision dated March 15, 2010**

**7 pages**

---

---

## SECTION A

---

### GENERAL PERMIT CONDITIONS

---

A permit issued under the provisions of paragraph 1200-03-09-.02(11) is a permit issued pursuant to the requirements of Title V of the Federal Act and its implementing Federal regulations promulgated at 40 CFR, Part 70.

- A1. Definitions.** Terms not otherwise defined in the permit shall have the meaning assigned to such terms in the referenced regulation.

TAPCR 1200-03

- A2. Compliance requirement.** All terms and conditions in a permit issued pursuant to paragraph 1200-03-09-.02(11) including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act.

The permittee shall comply with all conditions of its permit. Except for requirements specifically designated herein as not being federally enforceable (State Only), non-compliance with the permit requirements is a violation of the Federal Act and the Tennessee Air Quality Act and is grounds for enforcement action; for a permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. Non-compliance with permit conditions specifically designated herein as not being federally enforceable (State Only) is a violation of the Tennessee Air Quality Act and may be grounds for these actions.

TAPCR 1200-03-09-.02(11) (e)2(i) and 1200-03-09-.02(11) (e)1(vi) (I)

- A3. Need to halt or reduce activity.** The need to halt or reduce activity is not a defense for noncompliance. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. However, nothing in this item shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in assessing penalties for noncompliance if the health, safety or environmental impacts of halting or reducing operations would be more serious than the impacts of continuing operations.

TAPCR 1200-03-09-.02(11) (e)1(vi) (II)

- A4. The permit.** The permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

TAPCR 1200-03-09-.02(11) (e)1(vi) (III)

- A5. Property rights.** The permit does not convey any property rights of any sort, or any exclusive privilege.

TAPCR 1200-03-09-.02(11) (e)1(vi) (IV)

- A6. Submittal of requested information.** The permittee shall furnish to the Technical Secretary, within a reasonable time, any information that the Technical Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or termination of the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Technical Secretary copies of records required to be kept by the permit. If the permittee claims that such information is confidential, the Technical Secretary may review that claim and hold the information in protected status until such time that the Board can

hear any contested proceedings regarding confidentiality disputes. If the information is desired by EPA, the permittee may mail the information directly to EPA. Any claims of confidentiality for federal purposes will be determined by EPA.

TAPCR 1200-03-09-.02(11)(e)1(vi)(V)

- A7. Severability clause.** The requirements of this permit are severable. A dispute regarding one or more requirements of this permit does not invalidate or otherwise excuse the permittee from their duty to comply with the remaining portion of the permit.

TAPCR 1200-03-09.02(11)(e)1(v)

**A8. Fee payment.**

(a) The permittee shall pay an annual Title V emission fee based upon the responsible official's choice of actual emissions, allowable emissions, or a combination of actual and allowable emissions; and on the responsible official's choice of annual accounting period. An emission cap of 4,000 tons per year per regulated pollutant per major source SIC Code shall apply to actual or allowable based emission fees. A Title V annual emission fee will not be charged for emissions in excess of the cap. Title V annual emission fees will not be charged for carbon monoxide or for greenhouse gas pollutants solely because they are greenhouse gases.

(b) Title V sources shall pay allowable based emission fees until the beginning of the next annual accounting period following receipt of their initial Title V operating permit. At that time, the permittee shall begin paying their Title V fee based upon their choice of actual or allowable based fees, or mixed actual and allowable based fees. Once permitted, the Responsible Official may revise their existing fee choice by submitting a written request to the Division no later than December 31 of the annual accounting period for which the fee is due.

(c) When paying annual Title V emission fees, the permittee shall comply with all provisions of 1200-03-26-.02 and 1200-03-09-.02(11) applicable to such fees.

(d) Where more than one (1) allowable emission limit is applicable to a regulated pollutant, the allowable emissions for the regulated pollutants shall not be double counted. Major sources subject to the provisions of paragraph 1200-03-26-.02(9) shall apportion their emissions as follows to ensure that their fees are not double counted.

1. Sources that are subject to federally promulgated hazardous air pollutant under 40 CFR 60, 61, or 63 will place such regulated emissions in the regulated hazardous air pollutant (HAP) category.
2. A category of miscellaneous HAPs shall be used for hazardous air pollutants listed at part 1200-03-26-.02(2)(i)12 that are not subject to federally promulgated hazardous air pollutant standards under 40 CFR 60, 61, or 63.
3. HAPs that are also in the family of volatile organic compounds, particulate matter, or PM<sub>10</sub> shall not be placed in either the regulated HAP category or miscellaneous HAP category.
4. Sources that are subject to a provision of chapter 1200-03-16 New Source Performance Standards (NSPS) or chapter 0400-30-39 Standards of Performance for New Stationary Sources for pollutants that are neither particulate matter, PM<sub>10</sub>, sulfur dioxide (SO<sub>2</sub>), volatile organic compounds (VOC), nitrogen oxides (NO<sub>x</sub>), or hazardous air pollutants (HAPs) will place such regulated emissions in an NSPS pollutant category.
5. The regulated HAP category, the miscellaneous HAP category, and the NSPS pollutant category are each subject to the 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i).
6. Major sources that wish to pay annual emission fees for PM<sub>10</sub> on an allowable emission basis may do so if they have a specific PM<sub>10</sub> allowable emission standard. If a major source has a total particulate emission standard, but wishes to pay annual emission fees on an actual PM<sub>10</sub> emission basis, it may do so if the PM<sub>10</sub> actual emission levels are proven to the satisfaction of the Technical Secretary. The method to demonstrate the actual PM<sub>10</sub> emission levels must be made as part of the source's major source operating permit in advance in order to exercise this option. The PM<sub>10</sub> emissions reported under these options shall not be subject to fees under the family of particulate emissions. The 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i) shall also apply to PM<sub>10</sub> emissions.

TAPCR 1200-03-26-.02 and 1200-03-09-.02(11)(e)1(vii)

- A9. Permit revision not required.** A permit revision will not be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or process for changes that are provided for in the permit.

TAPCR 1200-03-09-.02(11)(e)1(viii)

**A10. Inspection and entry.** Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Technical Secretary or his authorized representative to perform the following for the purposes of determining compliance with the permit applicable requirements:

- (a) Enter upon, at reasonable times, the permittee's premises where a source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- (c) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- (d) As authorized by the Clean Air Act and Chapter 1200-03-10 of TAPCR, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.
- (e) "Reasonable times" shall be considered to be customary business hours unless reasonable cause exists to suspect noncompliance with the Act, Division 1200-03 or any permit issued pursuant thereto and the Technical Secretary specifically authorizes an inspector to inspect a facility at any other time.

TAPCR 1200-03-09-.02(11)(e)3.(ii)

**A11. Permit shield.**

- (a) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date of permit issuance, provided that:
  - 1. Such applicable requirements are included and are specifically identified in the permit; or
  - 2. The Technical Secretary, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.
- (b) Nothing in this permit shall alter or affect the following:
  - 1. The provisions of section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section. Similarly, the provisions of T.C.A. §68-201-109 (emergency orders) including the authority of the Governor under the section;
  - 2. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
  - 3. The applicable requirements of the acid rain program, consistent with section 408(a) of the Federal Act; or
  - 4. The ability of EPA to obtain information from a source pursuant to section 114 of the Federal Act.
- (c) Permit shield is granted to the permittee.

**A12. Permit renewal and expiration.**

- (a) An application for permit renewal must be submitted at least 180 days, but no more than 270 days, prior to the expiration of this permit. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted.
- (b) Provided that the permittee submits a timely and complete application for permit renewal the source will not be considered in violation of paragraph 1200-03-09-.02(11) until the Technical Secretary takes final action on the permit application, except as otherwise noted in paragraph 1200-03-09-.02(11).

(c) This permit, its shield provided in Condition A11, and its conditions will be extended and effective after its expiration date provided that the source has submitted a timely, complete renewal application to the Technical Secretary.

TAPCR 1200-03-09-.02(11)(f)3 and 2, 1200-03-09-.02(11)(d)1(i)(III), and 1200-03-09-.02(11)(a)2

**A13. Reopening for cause.**

(a) A permit shall be reopened and revised prior to the expiration of the permit under any of the circumstances listed below:

1. Additional applicable requirements under the Federal Act become applicable to the sources contained in this permit provided the permit has a remaining term of 3 or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the permit expiration date of this permit, unless the original has been extended pursuant to 1200-03-09-.02(11)(a)2.

2. Additional requirements become applicable to an affected source under the acid rain program.

3. The Technical Secretary or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

4. The Technical Secretary or EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

(b) Proceedings to reopen and issue a permit shall follow the same proceedings as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists, and not the entire permit. Such reopening shall be made as expeditiously as practicable.

(c) Reopenings for cause shall not be initiated before a notice of such intent is provided to the permittee by the Technical Secretary at least 30 days in advance of the date that the permit is to be reopened except that the Technical Secretary may provide a shorter time period in the case of an emergency. An emergency shall be established by the criteria of T.C.A. 68-201-109 or other compelling reasons that public welfare is being adversely affected by the operation of a source that is in compliance with its permit requirements.

(d) If the Administrator finds that cause exists to terminate, modify, or revoke and reissue a permit as identified in A13, he is required under federal rules to notify the Technical Secretary and the permittee of such findings in writing. Upon receipt of such notification, the Technical Secretary shall investigate the matter in order to determine if he agrees or disagrees with the Administrator's findings. If he agrees with the Administrator's findings, the Technical Secretary shall conduct the reopening in the following manner:

1. The Technical Secretary shall, within 90 days after receipt of such notification, forward to EPA a proposed determination of termination, modification, or revocation and reissuance, as appropriate. If the Administrator grants additional time to secure permit applications or additional information from the permittee, the Technical Secretary shall have the additional time period added to the standard 90 day time period.

2. EPA will evaluate the Technical Secretary's proposed revisions and respond as to their evaluation.

3. If EPA agrees with the proposed revisions, the Technical Secretary shall proceed with the reopening in the same manner prescribed under Condition A13 (b) and Condition A13 (c).

4. If the Technical Secretary disagrees with either the findings or the Administrator that a permit should be reopened or an objection of the Administrator to a proposed revision to a permit submitted pursuant to Condition A13(d), he shall bring the matter to the Board at its next regularly scheduled meeting for instructions as to how he should proceed. The permittee shall be required to file a written brief expressing their

position relative to the Administrator's objection and have a responsible official present at the meeting to answer questions for the Board. If the Board agrees that EPA is wrong in their demand for a permit revision, they shall instruct the Technical Secretary to conform to EPA's demand, but to issue the permit under protest preserving all rights available for litigation against EPA.

TAPCR 1200-03-09-.02(11) (f) 6 and 7.

**A14. Permit transference.** An administrative permit amendment allows for a change of ownership or operational control of a source where the Technical Secretary determines that no other change in the permit is necessary, provided that the following requirements are met:

(a) Transfer of ownership permit application is filed consistent with the provisions of 1200-03-09-.03(6), and

(b) written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to the Technical Secretary.

TAPCR 1200-03-09-.02(11) (f) 4(i) (IV) and 1200-03-09-.03(6)

**A15. Air pollution alert.** When the Technical Secretary has declared that an air pollution alert, an air pollution warning, or an air pollution emergency exists, the permittee must follow the requirements for that episode level as outlined in TAPCR 1200-03-09-.03(1) and TAPCR 1200-03-15-.03.

**A16. Construction permit required.** Except as exempted in TAPCR 1200-03-09-.04, or excluded in subparagraph TAPCR 1200-03-02-.01(1)(aa) or subparagraph TAPCR 1200-03-02-.01(1)(cc), this facility shall not begin the construction of a new air contaminant source or the modification of an air contaminant source which may result in the discharge of air contaminants without first having applied for and received from the Technical Secretary a construction permit for the construction or modification of such air contaminant source.

TAPCR 1200-03-09-.01(1) (a)

**A17. Notification of changes.** The permittee shall notify the Technical Secretary 30 days prior to commencement of any of the following changes to an air contaminant source which would not be a modification requiring a construction permit.

(a) change in air pollution control equipment

(b) change in stack height or diameter

(c) change in exit velocity of more than 25 percent or exit temperature of more than 15 percent based on absolute temperature.

TAPCR 1200-03-09-.02(7)

**A18. Schedule of compliance.** The permittee will comply with any applicable requirement that becomes effective during the permit term on a timely basis. If the permittee is not in compliance the permittee must submit a schedule for coming into compliance which must include a schedule of remedial measure(s), including an enforceable set of deadlines for specific actions.

TAPCR 1200-03-09-.02(11) (d) 3 and 40 CFR Part 70.5(c)

**A19. Title VI.**

(a) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR, Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:

1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to Section 82.156.

2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to Section 82.158.

3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to Section 82.161.

(b) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone depleting substance refrigerant in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR, Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

(c) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR, Part 82, Subpart G, Significant New Alternatives Policy Program.

**A20. 112 (r).** The permittee shall comply with the requirement to submit to the Administrator or designated State Agency a risk management plan, including a registration that reflects all covered processes, by June 21, 1999, if the permittee's facility is required pursuant to 40 CFR, 68, to submit such a plan.

---

**SECTION B**

---

**GENERAL CONDITIONS for MONITORING,  
REPORTING, and ENFORCEMENT**

---

**B1. Recordkeeping.** Monitoring and related record keeping shall be performed in accordance with the requirements specified in the permit conditions for each individual permit unit. In no case shall reports of any required monitoring and record keeping be submitted less frequently than every six months.

(a) Where applicable, records of required monitoring information include the following:

1. The date, place as defined in the permit, and time of sampling or measurements;
2. The date(s) analyses were performed;
3. The company or entity that performed the analysis;
4. The analytical techniques or methods used;
5. The results of such analyses; and
6. The operating conditions as existing at the time of sampling or measurement.

(b) Digital data accumulation which utilizes valid data compression techniques shall be acceptable for compliance determination as long as such compression does not violate an applicable requirement and its use has been approved in advance by the Technical Secretary.

TAPCR 1200-03-09-.02(11)(e)1(iii)

**B2. Retention of monitoring data.** The permittee shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

TAPCR 1200-03-09-.02(11)(e)1(iii)(II)II

**B3. Reporting.** Reports of any required monitoring and record keeping shall be submitted to the Technical Secretary in accordance with the frequencies specified in the permit conditions for each individual permit unit. Reports shall be submitted within 60 days of the close of the reporting period unless otherwise noted. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official. Reports required under "State only requirements" are not required to be certified by a responsible official.

TAPCR 1200-03-09-.02(11)(e)1(iii)

**B4. Certification.** Except for reports required under "State Only" requirements, any application form, report or compliance certification submitted pursuant to the requirements of this permit shall contain certification by a responsible official of truth, accuracy and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

TAPCR 1200-03-09-.02(11)(d)4

**B5. Annual compliance certification.** The permittee shall submit annually compliance certifications with terms and conditions contained in Sections A, B, D and E of this permit, including emission limitations, standards, or work practices. This compliance certification shall include all of the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable):

(a) The identification of each term or condition of the permit that is the basis of the certification;

(b) The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period; such methods and other means shall include, at a minimum, the methods and means required by this permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Act, which prohibits knowingly making a false certification or omitting material information;

(c) The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in B5(b) above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion\* or exceedance\*\* as defined below occurred; and

(d) Such other facts as the Technical Secretary may require to determine the compliance status of the source.

\* "Excursion" shall mean a departure from an indicator range established for monitoring under this paragraph, consistent with any averaging period specified for averaging the results of the monitoring.

\*\* "Exceedance" shall mean a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of a percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.

40 CFR Part 70.6(c)(5)(iii) as amended in the Federal Register Vol. 79, No.144, July 28, 2014, pages 43661 through 43667

**B6. Submission of compliance certification.** The compliance certification shall be submitted to:

The Tennessee Department of  
Environment and Conservation  
Environmental Field Office specified  
in Section E of this permit

and Air and EPCRA Enforcement  
Branch  
US EPA Region IV  
61 Forsyth Street, SW  
Atlanta, Georgia 30303

TAPCR 1200-03-09-.02(11)(e)3(v)(IV)

**B7. Emergency provisions.** An emergency constitutes an affirmative defense to an enforcement action brought against this source for noncompliance with a technology based emission limitation due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

(a) The affirmative defense of the emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

1. An emergency occurred and that the permittee can identify the probable cause(s) of the emergency. "Probable" must be supported by a credible investigation into the incident that seeks to identify the causes and results in an explanation supported by generally accepted engineering or scientific principles.

2. The permitted source was at the time being properly operated. In determining whether or not a source was being properly operated, the

Technical Secretary shall examine the source's written standard operating procedures which were in effect at the time of the noncompliance and any other code as detailed below that would be relevant to preventing the noncompliance. Adherence to the source's standard operating procedures will be the test of adequate preventative maintenance, careless operation, improper operation or operator error to the extent that such adherence would prevent noncompliance. The source's failure to follow recognized standards of practice to the extent that adherence to such a standard would have prevented noncompliance will disqualify the source from any claim of an emergency and an affirmative defense.

3. During the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.

4. The permittee submitted notice of the emergency to the Technical Secretary according to the notification criteria for malfunctions in rule 1200-03-20-.03. For the purposes of this condition, "emergency" shall be substituted for "malfunction(s)" in rule 1200-03-20-.03 to determine the relevant notification threshold. The notice shall include a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding the permittee seeking to establish the occurrence of an emergency has the burden of proof.

(c) The provisions of this condition are in addition to any emergency, malfunction or upset requirement contained in Division 1200-03 or other applicable requirement.

TAPCR 1200-03-09-.02(11)(e)7

**B8. Excess emissions reporting.**

(a) The permittee shall promptly notify the Technical Secretary when any emission source, air pollution control equipment, or related facility breaks down in such a manner to cause the emission of air contaminants in excess of the applicable emission standards contained in Division 1200-03 or any permit issued thereto, or of sufficient duration to cause damage to property or public health. The permittee must provide the Technical Secretary with a statement giving all pertinent facts, including the estimated duration of the breakdown. Violations of the visible emission standard which occur for less than 20 minutes in one day (midnight to midnight) need not be reported. Prompt notification will be within 24 hours of the malfunction and shall be provided by telephone to the Division's Nashville office. The Technical Secretary shall be notified when the condition causing the failure or breakdown has been corrected. In attainment and unclassified areas if emissions other than from sources designated as significantly impacting on a nonattainment area in excess of the standards will not and do not occur over more than a 24-hour period (or will not recur over more than a 24-hour period) and no damage to property and or public health is anticipated, notification is not required.

(b) Any malfunction that creates an imminent hazard to health must be reported by telephone immediately to the Division's Nashville office at (615) 532-0554 and to the State Civil Defense.

(c) A log of all malfunctions, startups, and shutdowns resulting in emissions in excess of the standards in Division 1200-03 or any permit issued thereto must be kept at the plant. All information shall be entered in the log no later than twenty-four (24) hours after the startup or shutdown is complete, or the malfunction has ceased or has been corrected. Any later discovered corrections can be added in the log as footnotes with the reason given for the change. This log must record at least the following:

1. Stack or emission point involved
2. Time malfunction, startup, or shutdown began and/or when first noticed
3. Type of malfunction and/or reason for shutdown
4. Time startup or shutdown was complete or time the air contaminant source returned to normal operation

5. The company employee making entry on the log must sign, date, and indicate the time of each log entry

The information under items 1. and 2. must be entered into the log by the end of the shift during which the malfunction or startup began. For any source utilizing continuous emission(s) monitoring, continuous emission(s) monitoring collection satisfies the above log keeping requirement.

TAPCR 1200-03-20-.03 and .04

**B9. Malfunctions, startups and shutdowns - reasonable measures required.** The permittee must take all reasonable measures to keep emissions to a minimum during startups, shutdowns, and malfunctions. These measures may include installation and use of alternate control systems, changes in operating methods or procedures, cessation of operation until the process equipment and/or air pollution control equipment is repaired, maintaining sufficient spare parts, use of overtime labor, use of outside consultants and contractors, and other appropriate means. Failures that are caused by poor maintenance, careless operation or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions. This provision does not apply to standards found in 40 CFR, Parts 60(Standards of performance for new stationary sources), 61(National emission standards for hazardous air pollutants) and 63(National emission standards for hazardous air pollutants for source categories).

TAPCR 1200-03-20-.02

**B10. Reserved.**

**B11. Report required upon the issuance of a notice of violation for excess emissions.**

The permittee must submit within twenty (20) days after receipt of the notice of violation, the data shown below to assist the Technical Secretary in deciding whether to excuse or validate the violation. If this data has previously been available to the Technical Secretary prior to the issuance of the notice of violation no further action is required of the violating source. However, if the source desires to submit additional information, then this must be submitted within the same twenty (20) day time period. The minimum data requirements are:

- (a) The identity of the stack and/or other emission point where the excess emission(s) occurred;
- (b) The magnitude of the excess emissions expressed in pounds per hour and the units of the applicable emission limitation and the operating data and calculations used in determining the magnitude of the excess emissions;
- (c) The time and duration of the emissions;
- (d) The nature and cause of such emissions;
- (e) For malfunctions, the steps taken to correct the situation and the action taken or planned to prevent the recurrence of such malfunctions;
- (f) The steps taken to limit the excess emissions during the occurrence reported, and
- (g) If applicable, documentation that the air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good operating practices for minimizing emissions.

Failure to submit the required report within the twenty (20) day period specified shall preclude the admissibility of the data for consideration of excusal for malfunctions.

TAPCR 1200-03-20-.06(2), (3) and (4)

---

## SECTION C

---

## PERMIT CHANGES

---

- C1. Operational flexibility changes.** The source may make operational flexibility changes that are not addressed or prohibited by the permit without a permit revision subject to the following requirements:
- (a) The change cannot be subject to a requirement of Title IV of the Federal Act or Chapter 1200-03-30.
  - (b) The change cannot be a modification under any provision of Title I of the federal Act or Division 1200-03.
  - (c) Each change shall meet all applicable requirements and shall not violate any existing permit term or condition.
  - (d) The source must provide contemporaneous written notice to the Technical Secretary and EPA of each such change, except for changes that are below the threshold of levels that are specified in Rule 1200-03-09-.04.
  - (e) Each change shall be described in the notice including the date, any change in emissions, pollutants emitted, and any applicable requirements that would apply as a result of the change.
  - (f) The change shall not qualify for a permit shield under the provisions of part 1200-03-09-.02(11)(e)6.
  - (g) The permittee shall keep a record describing the changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes. The records shall be retained until the changes are incorporated into subsequently issued permits.

TAPCR 1200-03-09-.02(11)(a)4 (ii)

- C2. Section 502(b)(10) changes.**
- (a) The permittee can make certain changes without requiring a permit revision, if the changes are not modifications under Title I of the Federal Act or Division 1200-3 and the changes do not exceed the emissions allowable under the permit. The permittee must, however, provide the Administrator and Technical Secretary with written notification within a minimum of 7 days in advance of the proposed changes. The Technical Secretary may waive the 7 day advance notice in instances where the source demonstrates in writing that an emergency necessitates the change. Emergency shall be demonstrated by the criteria of TAPCR 1200-03-09-.02(11)(e)7 and in no way shall it include changes solely to take advantages of an unforeseen business opportunity. The Technical Secretary and EPA shall attach each such notice to their copy of the relevant permit.
  - (b) The written notification must be signed by a facility Title V responsible official and include the following:
    - 1. brief description of the change within the permitted facility;
    - 2. specifies the date on which the change will occur;
    - 3. declares and quantifies where possible any change in emissions;
    - 4. declares any permit term or condition that is no longer applicable as a result of the change: and
    - 5. declares the requested change is not a Title I modification and will not exceed allowable emissions under the permit.
  - (c) The permit shield provisions of TAPCR 1200-03-09-.02(11)(e)6 shall not apply to Section 502(b)(10) changes.

TAPCR 1200-03-09-.02(11)(a)4 (i)

- C3. Administrative amendment.**
- (a) Administrative permit amendments to this permit shall be in accordance with 1200-03-09-.02(11)(f)4. The source may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request.
  - (b) The permit shield shall be extended as part of an administrative permit amendment revision consistent with the provisions of TAPCR 1200-03-09-.02(11)(e)6 for such revisions made pursuant to item (c) of this condition which meet the

relevant requirements of TAPCR 1200-03-09-.02(11)(e), TAPCR 1200-03-09-.02(11)(f) and TAPCR 1200-03-09-.02(11)(g) for significant permit modifications.

(c) Proceedings to review and grant administrative permit amendments shall be limited to only those parts of the permit for which cause to amend exists, and not the entire permit.

TAPCR 1200-03-09-.02(11)(f)4

**C4. Minor permit modifications.**

(a) The permittee may submit an application for a minor permit modification in accordance with TAPCR 1200-03-09-.02(11)(f)5(ii).

(b) The permittee may make the change proposed in its minor permit modification immediately after an application is filed with the Technical Secretary.

(c) Proceedings to review and modify permits shall be limited to only those parts of the permit for which cause to modify exists, and not the entire permit.

(d) Minor permit modifications do not qualify for a permit shield.

TAPCR 1200-03-09-.02(11)(f)5(ii)

**C5. Significant permit modifications.**

(a) The permittee may submit an application for a significant modification in accordance with TAPCR 1200-03-09-.02(11)(f)5(iv).

(b) Proceedings to review and modify permits shall be limited to only those parts of the permit for which cause to modify exists, and not the entire permit.

TAPCR 1200-03-09-.02(11)(f)5(iv)

**C6. New construction or modifications.**

Future construction at this source that is subject to the provisions of TAPCR 1200-03-09-.01 shall be governed by the following:

(a) The permittee shall designate in their construction permit application the route that they desire to follow for the purposes of incorporating the newly constructed or modified sources into their existing operating permit. The Technical Secretary shall use that information to prepare the operating permit application submittal deadlines in their construction permit.

(b) Sources desiring the permit shield shall choose the administrative amendment route of TAPCR 1200-03-09-.02(11)(f)4 or the significant modification route of TAPCR 1200-03-09-.02(11)(f)5(iv).

(c) Sources desiring expediency instead of the permit shield shall choose the minor permit modification procedure route of TAPCR 1200-03-09-.02(11)(f)5(ii) or group processing of minor modifications under the provisions of TAPCR 1200-03-09-.02(11)(f)5(iii) as applicable to the magnitude of their construction.

TAPCR 1200-03-09-.02(11)(d) 1(i)(V)

---

**SECTION D**

---

**GENERAL APPLICABLE REQUIREMENTS**

---

- D1. Visible emissions.** With the exception of air emission sources exempt from the requirements of TAPCR Chapter 1200-03-05 and air emission sources for which a different opacity standard is specifically provided elsewhere in this permit, the permittee shall not cause, suffer, allow or permit discharge of a visible emission from any air contaminant source with an opacity in excess of twenty (20) percent for an aggregate of more than five (5) minutes in any one (1) hour or more than twenty (20) minutes in any twenty-four (24) hour period; provided, however, that for fuel burning installations with fuel burning equipment of input capacity greater than 600 million btu per hour, the permittee shall not cause, suffer, allow, or permit discharge of a visible emission from any fuel burning installation with an opacity in excess of twenty (20) percent (6-minute average) except for one six minute period per one (1) hour of not more than forty (40) percent opacity. Sources constructed or modified after July 7, 1992 shall utilize 6-minute averaging.

Consistent with the requirements of TAPCR Chapter 1200-03-20, due allowance may be made for visible emissions in excess of that permitted under TAPCR 1200-03-05 which are necessary or unavoidable due to routine startup and shutdown conditions. The facility shall maintain a continuous, current log of all excess visible emissions showing the time at which such conditions began and ended and that such record shall be available to the Technical Secretary or his representative upon his request.

TAPCR 1200-03-05-.01(1), TAPCR 1200-03-05-.03(6) and TAPCR 1200-03-05-.02(1)

- D2. General provisions and applicability for non-process gaseous emissions.** Any person constructing or otherwise establishing a non-portable air contaminant source emitting gaseous air contaminants after April 3, 1972, or relocating an air contaminant source more than 1.0 km from the previous position after November 6, 1988, shall install and utilize the best equipment and technology currently available for controlling such gaseous emissions.

TAPCR 1200-03-06-.03(2)

- D3. Non-process emission standards.** The permittee shall not cause, suffer, allow, or permit particulate emissions from non-process sources in excess of the standards in TAPCR 1200-03-06.

- D4. General provisions and applicability for process gaseous emissions.** Any person constructing or otherwise establishing an air contaminant source emitting gaseous air contaminants after April 3, 1972, or relocating an air contaminant source more than 1.0 km from the previous position after November 6, 1988, shall install and utilize equipment and technology which is deemed reasonable and proper by the Technical Secretary.

TAPCR 1200-03-07-.07(2)

- D5. Particulate emissions from process emission sources.** The permittee shall not cause, suffer, allow, or permit particulate emissions from process sources in excess of the standards in TAPCR 1200-03-07.

- D6. Sulfur dioxide emission standards.** The permittee shall not cause, suffer, allow, or permit Sulfur dioxide emissions from process and non-process sources in excess of the standards in TAPCR 1200-03-14. Regardless of the specific emission standard, new process sources shall utilize the best available control technology as deemed appropriate by the Technical Secretary of the Tennessee Air Pollution Control Board.

**D7. Fugitive Dust.**

(a) The permittee shall not cause, suffer, allow, or permit any materials to be handled, transported, or stored; or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions shall include, but not be limited to, the following:

1. Use, where possible, of water or chemicals for control of dust in demolition of existing buildings or structures, construction operations, grading of roads, or the clearing of land;
2. Application of asphalt, oil, water, or suitable chemicals on dirt roads, material stock piles, and other surfaces which can create airborne dusts;

3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting or other similar operations.

(b) The permittee shall not cause, suffer, allow, or permit fugitive dust to be emitted in such manner to exceed five (5) minutes per hour or twenty (20) minutes per day as to produce a visible emission beyond the property line of the property on which the emission originates, excluding malfunction of equipment as provided in Chapter 1200-03-20.

TAPCR 1200-03-08

D8. **Open burning.** The permittee shall comply with the TAPCR 1200-03-04-.04 for all open burning activities at the facility.

TAPCR 1200-03-04

D9. **Asbestos.** Where applicable, the permittee shall comply with the requirements of 1200-03-11-.02(2)(d) when conducting any renovation or demolition activities at the facility.

TAPCR 1200-03-11-.02(2)(d) and 40 CFR, Part 61

D10. **Annual certification of compliance.** The generally applicable requirements set forth in Section D of this permit are intended to apply to activities and sources that are not subject to source-specific applicable requirements contained in the State of Tennessee and U.S. EPA regulations. By annual certification of compliance, the permittee shall be considered to meet the monitoring and related record keeping and reporting requirements of TAPCR 1200-03-09-.02(11)(e)1.(iii) and 1200-03-10-.04(2)(b)1 and compliance requirements of TAPCR 1200-03-09-.02(11)(e)3.(i). The permittee shall submit compliance certification for these conditions annually.

## SECTION E

### SOURCE SPECIFIC EMISSION STANDARDS, OPERATING LIMITATIONS, and MONITORING, RECORDKEEPING and REPORTING REQUIREMENTS

37-0076	<b><u>Facility Description:</u></b>	The company operates a rotogravure printing operation primarily engaged in printing labels for various food and cigarette packages. The facility is subject to the MACT, NESHAP, 40CFR, Part 63, Subpart KK: National Emission Standards for the Printing and Publishing Industry. The company declared the facility as an area source pursuant to 40 CFR 63.820(a)(2). The provisions in Subpart KK allow for affected sources to limit their HAP emissions potential and be considered an area source. With area source status, the facility is not subject to emission rate limitations but is subject to the record keeping provisions of 40 CFR 63.829(d).
---------	-------------------------------------	---

Conditions E1 through E3-9 apply to all sources in Section E of this permit unless otherwise noted.

#### E1. Fee payment:

FEE EMISSIONS SUMMARY TABLE FOR MAJOR SOURCE 37-0076

REGULATED POLLUTANTS	ALLOWABLE EMISSIONS (tons per AAP)	ACTUAL EMISSIONS (tons per AAP)	COMMENTS
PARTICULATE MATTER (PM)	15.6	N/A	Includes all fee emissions.
PM <sub>10</sub>	N/A	N/A	Includes all fee emissions.
SO <sub>2</sub>	1.0	N/A	Includes all fee emissions.
VOC	199	N/A	Includes all fee emissions.
NO <sub>x</sub>	7.0	N/A	Includes all fee emissions.
CATEGORY OF MISCELLANEOUS HAZARDOUS AIR POLLUTANTS (HAP WITHOUT A STANDARD)*			
VOC FAMILY GROUP	N/A	N/A	
NON-VOC GASEOUS GROUP	N/A	N/A	
PM FAMILY GROUP	N/A	N/A	N/A
CATEGORY OF SPECIFIC HAZARDOUS AIR POLLUTANTS (HAP WITH A STANDARD)**			
VOC FAMILY GROUP	9.9 individual HAP 24.9 total HAPs	N/A	Fee emissions are included above. MACT 40 CFR Part 63 Subpart KK
NON-VOC GASEOUS GROUP	N/A	N/A	N/A
PM FAMILY GROUP	N/A	N/A	N/A
CATEGORY OF NSPS POLLUTANTS NOT LISTED ABOVE***			
EACH NSPS POLLUTANT NOT LISTED ABOVE	N/A	N/A	Fee emissions are not included above.

#### NOTES

**AAP** The Annual Accounting Period (AAP) is a twelve (12) consecutive month period that begins each July 1st and ends June 30th of the following year. The present Annual Accounting Period began July 1, 2017 and ends June 30,

**2018.** The **next Annual Accounting Period begins July 1, 2018 and ends June 30, 2019,** unless a request to change the annual accounting period is submitted by the responsible official as required by subparagraph 1200-03-26-.02(9)(b) and approved by the Technical Secretary. If the permittee wishes to revise their annual accounting period or their annual emission fee basis as allowed by subparagraph 1200-03-26-.02(9)(b), the responsible official must submit the request to the Division in writing on or before December 31 of the annual accounting period for which the fee is due. If a change in fee basis from allowable emissions to actual emissions for any pollutant is requested, the request from the responsible official must include the methods that will be used to determine actual emissions..

**N/A** N/A indicates that no emissions are specified for fee computation.

**AEAR** AEAR indicates that an **Actual Emissions Analysis is required** to determine the actual emissions of:

- (1) **each regulated pollutant** (Particulate matter, SO<sub>2</sub>, VOC, NO<sub>x</sub> and so forth. See TAPCR 1200-03-26-.02(2)(i) for the definition of a regulated pollutant.),
- (2) **each pollutant group** (VOC Family, Non-VOC Gaseous, and Particulate Family), and
- (3) the **Miscellaneous HAP Category** under consideration during the **Annual Accounting Period**.

**\*** **Category Of Miscellaneous HAP (HAP Without A Standard):** This category is made-up of hazardous air pollutants that do not have a federal or state standard. Each HAP is classified into one of three groups, the **VOC Family** group, the **Non-VOC Gaseous** group, or the **Particulate (PM) Family** group. **For fee computation,** the **Miscellaneous HAP Category** is subject to the 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i).

**\*\*** **Category Of Specific HAP (HAP With A Standard):** This category is made-up of hazardous air pollutants (HAP) that are subject to Federally promulgated Hazardous Air Pollutant Standards that can be imposed under Chapter 1200-03-11 or Chapter 1200-03-31. Each individual hazardous air pollutant is classified into one of three groups, the **VOC Family** group, the **Non-VOC Gaseous** group, or the **Particulate (PM) Family** group. **For fee computation,** each individual hazardous air pollutant of the **Specific HAP Category** is subject to the 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i).

**\*\*\*** **Category Of NSPS Pollutants Not Listed Above:** This category is made-up of each **New Source Performance Standard (NSPS)** pollutant whose emissions are not included in the **PM, SO<sub>2</sub>, VOC or NO<sub>x</sub>** emissions from each source in this permit. **For fee computation,** each **NSPS pollutant not listed above** is subject to the 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i).

#### END NOTES

- The permittee shall:**
- (1) Pay Title V **annual emission fees**, on the emissions and year bases requested by the responsible official and approved by the Technical Secretary, for each annual accounting period (AAP) by the payment deadline(s) established in TAPCR 1200-03-26-.02(9)(g). Fees may be paid on an **actual, allowable, or mixed** emissions basis; and on either a **state fiscal year** or a **calendar year**, provided the requirements of 1200-03-26-.02(9)(b) are met. If any part of any fee imposed under TAPCR 1200-03-26-.02 is not paid within fifteen (15) days of the due date, penalties shall at once accrue as specified in TAPCR 1200-03-26-.02(8).
  - (2) Sources paying annual emissions fees on an allowable emissions basis: pay annual

- allowable based emission fees for each annual accounting period pursuant to TAPCR 1200-03-26-.02(9)(d).
- (3) Sources paying annual emissions fees on an actual emissions basis: prepare an **actual emissions analysis** for each AAP and pay **actual based emission fees** pursuant to TAPCR 1200-03-26-.02(9)(d). The **actual emissions analysis** shall include:
    - (a) the completed **Fee Emissions Summary Table**,
    - (b) each **actual emissions analysis** required, and
    - (c) the actual emission records for each pollutant and each source as required for actual emission fee determination, or a summary of the actual emission records required for fee determination, as specified by the Technical Secretary or the Technical Secretary's representative. These calculations must be based on the annual fee basis approved by the Technical Secretary (a state fiscal year [July 1 through June 30] or a calendar year [January 1 through December 31]). These records shall be used to complete the **actual emissions analyses** required by the above **Fee Emissions Summary Table**.
  - (4) Sources paying annual emissions fees on a mixed emissions basis: for all pollutants and all sources for which the permittee has chosen an actual emissions basis, prepare an **actual emissions analysis** for each AAP and pay **actual based emission fees** pursuant to TAPCR 1200-03-26-.02(9)(d). The **actual emissions analysis** shall include:
    - (a) the completed **Fee Emissions Summary Table**,
    - (b) each **actual emissions analysis** required, and
    - (c) the actual emission records for each pollutant and each source as required for actual emission fee determination, or a summary of the actual emission records required for fee determination, as specified by the Technical Secretary or the Technical Secretary's representative. These calculations must be based on the fee bases approved by the Technical Secretary (payment on an actual or mixed emissions basis) and payment on a state fiscal year (July 1 through June 30) or a calendar year (January 1 through December 31). These records shall be used to complete the **actual emissions analysis**.
- For all pollutants and all sources for which the permittee has chosen an allowable emissions basis, pay allowable based emission fees pursuant to TAPCR 1200-03-26-.02(9)(d).
- (5) When paying on an actual or mixed emissions basis, submit the **actual emissions analyses** at the time the fees are paid in full.

The annual emission fee due dates are specified in TAPCR 1200-03-26-.02(g) and are dependent on the Responsible Official's choice of fee bases as described above. If any part of any fee imposed under TAPCR 1200-03-26-.02 is not paid within fifteen (15) days of the due date, penalties shall at once accrue as specified in TAPCR 1200-03-26-.02(8). Emissions for regulated pollutants shall not be double counted as specified in Condition A8(d) of this permit.

**Payment of the fee due and the actual emissions analysis (if required) shall be submitted to The Technical Secretary at the following address:**

Payment of Fee to:

The Tennessee Department of Environment and Conservation      and  
 Division of Fiscal Services  
 Consolidated Fee Section – APC  
 William R. Snodgrass Tennessee Tower  
 312 Rosa L. Parks Avenue, 10th Floor  
 Nashville, Tennessee 37243

Actual Emissions Analyses to:

The Tennessee Department of  
 Environment and Conservation  
 Division of Air Pollution Control  
 East Tennessee Permit Program  
 William R. Snodgrass Tennessee Tower  
 312 Rosa L. Parks Avenue, 15th Floor  
 Nashville, Tennessee 37243

or

An electronic copy (PDF) of actual emissions analysis  
 can also be submitted to: [apc.inventory@tn.gov](mailto:apc.inventory@tn.gov)

TAPCR 1200-03-26-.02 (3) and (9), and 1200-03-09-.02(11) (e)1 (iii) and (vii)

In lieu of submitting a paper copy to the above address, an electronic copy (PDF) can also be submitted to the following email address:

[Air.pollution.control@tn.gov](mailto:Air.pollution.control@tn.gov)

## **E2. Reporting requirements**

### **(a) Semiannual reports.**

The first report since issuance of this permit renewal shall cover the 6-month period from July 1, 2017, to December 31, 2017, and shall be submitted within sixty (60) days (due date March 29, 2018). Subsequent reports shall be submitted within sixty (60) days after the end of each six (6)-month period following the first report.

These semiannual reports shall include:

- (1) Any monitoring and recordkeeping required by conditions E3-2, E3-3, E3-5, E4-8, E4-9, E4-11, and E5-2 of this permit. However, a summary report of this data is acceptable provided there is sufficient information to enable the Technical Secretary to evaluate compliance.
- (2) The visible emission evaluation readings from condition E3-8 of this permit if required. However, a summary report of this data is acceptable provided there is sufficient information to enable the Technical Secretary to evaluate compliance.
- (3) Identification of all instances of deviations from **ALL PERMIT REQUIREMENTS**. If no deviations occur, a statement that no deviations occurred during the specific period.
- (4) The day(s) that the source(s) does not operate shall be noted in the recordkeeping section for each source.

**These reports must be certified by a responsible official consistent with condition B4 of this permit and shall be submitted to The Technical Secretary at the address in Condition E2(b) of this permit.**

TAPCR 1200-03-09-.02(11)(e)1.(iii)

### **(b) Annual compliance certification.**

The permittee shall submit annually compliance certifications with the terms and conditions contained in Sections A, B, D and E of this permit, including emission limitations, standards, or work practices. This compliance certification shall include all of the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable):

- (1) The identification of each term or condition of the permit that is the basis of the certification;
- (2) The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period; Such methods and other means shall include, at a minimum, the methods and means required by this permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Act, which prohibits knowingly making a false certification or omitting material information;

- (3) The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in E2(b)2 above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an \*excursion or \*\*exceedance as defined below occurred; and
- (4) Such other facts as the Technical Secretary may require to determine the compliance status of the source.

\* "Excursion" shall mean a departure from an indicator range established for monitoring under this paragraph, consistent with any averaging period specified for averaging the results of the monitoring.

\*\* "Exceedance" shall mean a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of a percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.

The first certification shall cover the twelve (12)-month period from **July 1, 2017, to June 30, 2018**, and shall be submitted within sixty (60) days after the end of the twelve (12)-month period (due date: August 29, 2018). Subsequent certifications shall be submitted within sixty (60) days after the end of each twelve (12)-month period following the first certification.

These certifications shall be submitted to: **Tennessee Division of Air Pollution Control TN APCD and EPA at the following addresses:**

The Technical Secretary	Air and EPCRA Enforcement Branch
Division of Air Pollution Control	US EPA Region IV
Johnson City Environmental Field Office	61 Forsyth Street, SW
2305 Silverdale Road	Atlanta, GA 30303
Johnson City, TN 37601-2162	

40 CFR Part 70.6(c)(5)(iii) as amended in the Federal Register Vol.62, No.204, October 22, 1997, pages 54946 and 54947

In lieu of submitting a paper copy to the above address for the Johnson City Field Office, an electronic copy (PDF) can also be submitted to the following email address:

[APC.JCEFO@tn.gov](mailto:APC.JCEFO@tn.gov)

#### **E2-1. Identification of Responsible Official and Technical Contact, and Billing Contact of the permitted facility:**

a) The application that was utilized in the preparation of this permit is dated October 2, 2016, and signed by Mr. Michael H. Lee, General Manager, who was the Responsible Official of the permitted facility at the time. Ms. Carol A. Rod, General Manager, is the new Responsible Official of the permitted facility according to the document dated May 30, 2017. If this person terminates employment or is assigned different duties and is no longer a Responsible Official for this facility as defined in part 1200-03-09-.02(11)(b)21 of the Tennessee Air Pollution Control Regulations, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within thirty (30) days of

the change. The notification shall include the name and title of the new Responsible Official and certification of truth and accuracy. All representations, agreement to terms and conditions, and covenants made by the former Responsible Official that were used in the establishment of the permit terms and conditions will continue to be binding on the facility until such time that a revision to this permit is obtained that would change said representations, agreements, and/or covenants.

b) The application that was utilized in the preparation of this permit is dated October 2, 2016, and signed by Mr. Michael H. Lee, General Manager, who was the Responsible Official of the permitted facility at the time. The Principal Technical Contact for the permitted facility is now Mr. Ed Dupuis according to the document dated May 30, 2017. If this person terminates employment or is assigned different duties and is no longer the Principal Technical Contact for this facility, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within thirty (30) days of the change. The notification shall include the name and title of the new Principal Technical Contact and certification of truth and accuracy.

c) The application that was utilized in the preparation of this permit is dated October 2, 2016, and signed by Mr. Michael H. Lee, General Manager, who was the Responsible Official of the permitted facility at the time. Mr. Ed Dupuis is the Billing Contact for the permitted facility according to the document dated May 30, 2017. If this person terminates employment or is assigned different duties and is no longer the Billing Contact for this facility, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within thirty (30) days of the change. The notification shall include the name and title of the new Billing Contact and certification of truth and accuracy.

### **E3. General Permit requirements**

#### **E3-1. Subpart QQ requirements**

The owner or operator of this source shall comply with the requirements specified in 40 CFR §60.432, Subpart QQ - no owner or operator subject to the provision of subpart QQ shall cause to be discharged into the atmosphere from any affected facility VOC equal to more than 16 percent of the total mass of VOC solvent and water used at the facility during any one performance averaging period. The water used includes only that water contained in the waterborne raw inks and related coatings and the water added for dilution with waterborne ink system.

Permit 563209, Condition E3-1; issued on June 12, 2012

**Compliance Method:** Compliance with this condition shall be assured by compliance with condition E4-9 and E4-11.

#### **E3-2. VOC and HAP containing material requirements**

Purchase orders and/or invoices or a record of purchase orders and/or invoices for all VOC and HAP containing materials along with information or logs thereof containing VOC content, solids content and HAP content (such as material safety data sheets, certifications, technical data sheets, or laboratory analyses) must be maintained and kept available for inspection by the Technical Secretary or representative. These records shall be retained in accordance with condition B2.

Permit 563209, Condition E3-2; issued on June 12, 2012, TAPCR 1200-03-09-.02(11) (e)1.(iii)

**New material requirement**

Should the permittee use VOC-containing materials that have not been represented in prior permits, the as-applied VOC contents of these materials shall be determined once as detailed below and the information entered into the following log. The log, along with current Material Safety Data Sheets and/or other appropriate manufacturer or vendor information, shall be submitted to the Technical Secretary within 90 days of the initial date of the use of these materials.

- (a) Printing Inks - by using the procedures and analyses of EPA Method 24 (one hour bake) (Part 1200-03-16-.01(5)(g)(24) of the Tennessee Air Pollution Control Regulations) for printing inks and related coatings.

These data may be obtained by laboratory analysis or from manufacturing or vendor certification stating the VOC content was determined by EPA Method 24. When more than 50 inks are used annually, a representative sampling of inks may be analyzed by Method 24. The representative sampling shall include inks which at a minimum represents 90 percent (%) of the volume of the inks utilized at this source. The representative sampling procedure which is acceptable to the Division of Air Pollution Control is stipulated in the December 29, 1997, letter to the Division from International Playing Card & Label (IPC&L) (previous owner) and approved by the Division in letter dated January 6, 1998.

- (b) Solvent/Ancillary Materials - by using manufacturer or vendor certification which explicitly list the VOC content by weigh.

**VOC/HAP CONTENT LOG FOR SOURCE 37-0076**

MATERIAL NAME	MATERIAL DENSITY (pounds MATERIAL per gallon)	VOC CONTENT (pounds VOC per gallon)	HAP <sub>1</sub> CONTENT (pounds HAP <sub>1</sub> per gallon)	HAP <sub>p</sub> CONTENT (pounds HAP <sub>p</sub> per gallon)	TOTAL HAP CONTENT (pounds HAP <sub>1</sub> through HAP <sub>p</sub> per gallon)
Material 1					
Material 2					
Material i					

Note: I = 1, 2, 3, ..., n = the number of different materials, and p = 1, 2, 3, ..., n = the number of different hazardous air pollutants. Use columns as required for the number of different hazardous air pollutants.

**E3-3. Subpart KK area source declaration**

In accordance with 40 CFR Part 63 Section 63.820(a)(7) of Subpart KK, a facility can become an area source subject only to the provisions of paragraphs 40 CFR §63.829(d) and §63.830(b)(1) of the aforementioned subpart KK by limiting its potential emissions through appropriate mechanisms that may be available through the regulatory authority. Therefore, by imposing permit conditions to restrict the facility's potential and actual emission quantities of HAP, including materials used for source categories or purposes other than printing and publishing, to quantities below the major source threshold of 10 tons of a single HAP and/or 25 tons of a combination of HAP, the requirements of this subpart with the exception of paragraphs 40 CFR §63.829(d) and §63.830(b)(1) of the aforementioned subpart KK are not applicable. The maximum emission rate from the entire plant for any single HAP listed pursuant to Section 112(b) of the Federal Clean Air Act, shall be less than ten (10) tons per year. Total emissions of all HAPs from the entire plant, including this source, shall be less than twenty-five (25) tons per year.

**Compliance Method:** Compliance with this requirement shall be assured through recordkeeping of HAP emissions and by submitting semiannual reports and periodic reports as required. Monthly and yearly HAP emissions from this facility (37-0076) shall be calculated and maintained by keeping the logs specified in condition E4-9. These logs shall be used to certify compliance with this condition and in the reporting requirements of condition E2 of this permit. These logs must be retained in accordance with condition B2. Reports and certifications for this requirement shall be submitted to the following addresses.

Technical Secretary	Air and EPCRA Enforcement Branch
Division of Air Pollution Control	US EPA Region IV
William R. Snodgrass Tennessee Tower	61 Forsyth Street, SW
312 Rosa L. Parks Avenue, 15th Floor	Atlanta, GA 30303
Nashville, TN 37243-1531	

**E3-4. Hazardous Air Pollutant (HAP) limitation**

In the event that the emissions from this plant are ten (10) tons per year or more for any single HAP, or twenty-five (25) tons per year or more for total HAPs, the permittee shall provide written notification of the exceedance(s) to the Technical Secretary within fifteen (15) days from the date of discovery.

Permit 563209, Condition E3-4; issued on June 12, 2012

**E3-5. Facility Volatile Organic Compounds (VOC) limitation**

VOC emitted from the entire plant shall not exceed 199 tons during all intervals of 12 consecutive months.

TAPCR 1200-03-07-.07(2)

**Compliance Method:** Compliance with this emissions limitation shall be assured by recordkeeping of material usage rates and operation of the emission control devices (regenerative thermal oxidizer system). VOC and HAP emissions from this source shall be calculated and maintained by keeping logs as detailed in condition E4-9.

**E3-6. Working condition of VOC control equipment**

In the event that the working condition(s) of any VOC control device(s) becomes questionable, the Technical Secretary has full discretion to require the owner or the operator of this source to conduct VOC emission performance test (s) or other VOC emission analysis on the VOC control device(s) involved.

Permit 563209, Condition E3-6; issued on June 12, 2012

**E3-7. Data requirements**

For sources required to maintain monthly logs, all data, including all required calculations, must be entered in the log no later than 30 days from the end of the month for which the data is required. For sources required to maintain weekly logs, all data, including all required calculations, must be entered in the log no later than 7 days from the end of the week for which the data is required. For sources required to maintain daily logs, all data, including all

required calculations, must be entered in the log no later than 7 days from the end of the day for which the data is required.

TAPCR 1200-03-09-.02(11)(e)1.(iii)(II)II

### E3-8. Visible emissions restriction

Visible emissions from this facility, unless otherwise noted, shall not exceed twenty (20) percent opacity except for one six minute period per one (1) hour or more than four six-minute periods in any twenty-four (24) hour period. Visible emissions from this source shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (6 minute average).

**Compliance Method:** The permittee shall assure compliance with the opacity standard by utilizing the opacity matrix dated June 18, 1996, as amended September 11, 2013, that is enclosed as Attachment 1.

**If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.**

TAPCR 1200-03-05-.01(1), TAPCR 1200-03-05-.03(6)

### E3-9. Insignificant activities

Insignificant activities as stated by the permittee in the Title V Application per Rule 1200-03-09-.04(5) are listed below. Additional insignificant activities may be added and operated at any time with the provision that a written notification shall be submitted to the Technical Secretary including an updated APC V.2 application form along with a truth, accuracy, and completeness statement signed by a responsible official. The permit may be updated to include additional insignificant sources by means of an administrative amendment, if necessary.

Activity	Exempt Under Rule
Solvent tank farm	1200-03-09-.04(5)(a)(4)(i)
Propane tank	1200-03-09-.04(5)(a)(4)(i)
Portable welding and brazing	1200-03-09-.04(5)(f)(21)
Comfort heating	1200-03-09-.04(5)(f)(14)
Laboratory	1200-03-09-.04(5)(f)(19)
Maintenance solvent washer	1200-03-09-.04(5)(f)(45)
Lubricants	1200-03-09-.04(5)(f)(63)
Solid waste dumpsters	1200-03-09-.04(5)(f)(74)
Hot house gas heater	1200-03-09-.04(5)(a)(4)(i)
Hot oil dryers	1200-03-09-.04(5)(a)(4)(i)
Caustic Cleaning Operation	1200-03-09-.04(5)(a)(4)(i)
Serialization Line	1200-03-09-.04(5)(a)(4)(i)

37-0076-	Source	This source consists of the following operations: 1). Rotogravure
----------	--------	---

01	<b>Identification (MM1):</b>	<p>printing process No. 28, ink hose tank, floor mopping and press cleanup (previously permitted as 37-0076-01); 2). Rotogravure printing press No. 29 (previously permitted as 37-0076-05); 3). Rotogravure printing press No. 30 (New Equipment per this modification). Two (2) regenerative thermal oxidizers (RTO #1 and RTO #2) operating in parallel for control of VOC and Organic HAP emissions.</p> <p>This source has a CAM plan.</p>
----	------------------------------	---

**E4. Conditions specific to source 37-0076-01.**

**E4-1. Applicability Rules for source 37-0076-01**

The permittee shall comply with the applicable requirements of Rule 1200-03-18-.35 of the Tennessee Air Pollution Control Regulations (Volatile Organic Compounds - Graphic Arts Systems) as indicated below.

Applicable Rule	Requirement	Compliance Method - Applicable Permit Condition
1200-03-18-.35(5)(a)1.	Minimum destruction efficiency of 90% for control device.	Condition E4-9 and E4-11
1200-03-18-.35(5)(a)2.	Minimum VOC capture efficiency	Condition E4-11(1)
1200-03-18-.35(5)(b)1.	Operate capture system and control device at all times that the printing press is in operation	Condition E4-10 and E4-11
	Demonstrate compliance with this rule through the applicable coating analysis and capture system and control device efficiency test methods specified in chapter 18.	Condition E4-11
1200-03-18-.35(5)(b)2.	Equip the control device with the applicable monitoring equipment specified in chapter 18,	Condition E4-9 and E4-11
	Install, calibrate, operate, and maintain the monitoring equipment according vendor's specifications at all times the control device is in use.	Condition E4-9 and E4-11
1200-03-18-.35(6)	The VOC content of each coating and ink and the efficiency of each capture system and control device shall be determined by the applicable test methods and procedures specified in chapter 18 to establish the records required under Paragraph (7) of the rule.	Conditions E3-2 and E4-9
1200-03-18-.35(7)(d)	Any printing press complying by means of control devices shall comply with TAPCR 1200-03-18-.03(5).	Conditions E4-11
1200-03-18-.03(5)(a)	Perform a compliance test, as applicable, upon startup of a new line or operation, or upon changing the method of compliance for any existing	Condition E4-11

Applicable Rule	Requirement	Compliance Method - Applicable Permit Condition
	line or operation from the use of complying coatings or inks or weighted averaging to control devices. Testing shall have been performed or shall be performed pursuant to the procedures specified and referenced in chapter 18. No later than 60 days after completion of the performance test, the permittee shall submit results of all tests and calculations necessary to demonstrate compliance.	
1200-03-18-.03(5) (b)	Recordkeeping Requirements	Conditions E4-11(3)
1200-03-18-.03(5) (c)	Notify the Technical Secretary of noncompliance within 30 calendar days of the occurrence.	Condition E4-11(5)

TAPCR 1200-03-18-.35

#### E4-2. Sulfur dioxide (SO<sub>2</sub>) emission limit

SO<sub>2</sub> emitted from this source shall not exceed **0.22 pounds per hour (lb/hr)** on a 24-hour averaging basis and **1.0 tons** during all intervals of 12 consecutive months.

TAPCR 1200-03-07.01(5), permit application dated November 23, 2009, and Permit 563209, Condition E4-2; issued on June 12, 2012

**Compliance Method:** Compliance with this condition shall be assured by using only natural gas or propane as fuel and by fuel usage calculations. These calculations will be based on residence time and burn chamber capacity as appropriate. Fuel usage is equal to fuel density multiplied by the air exhaust flow rate from the permit application and the residence time. Residence time equals burn chamber capacity divided by air flow rate. Units of time will be converted to hours and mass will be converted to pounds.

#### E4-3. Oxides of Nitrogen (NO<sub>x</sub>) emission limit

NO<sub>x</sub> emitted from this source shall not exceed **1.62 pounds per hour (lb/hr)** on a 24-hour averaging basis and **7.0 tons** during all intervals of 12 consecutive months.

TAPCR 1200-03-07.01(5), permit application dated November 23, 2009, and Permit 563209, Condition E4-3; issued on June 12, 2012

**Compliance Method:** Compliance with this condition shall be assured by using only natural gas or propane as fuel and by fuel usage calculations. These calculations will be based on residence time and burn chamber capacity as appropriate. Assume an appropriate air to fuel ratio. Fuel usage is equal to fuel density multiplied by the air exhaust flow rate from the permit application and the residence time. Residence time equals burn chamber capacity divided by air flow rate. Units of time will be converted to hours and mass will be converted to pounds.

**E4-4. Emission reductions of NO<sub>x</sub> requirement**

NO<sub>x</sub> reductions from this source shall be achieved by the use of low-NO<sub>x</sub> burners for RTO #1, RTO #2, and the gas-fired dryers for Press #30 .

**Compliance Method:** For each equipment item listed above, the permittee shall retain copies of the manufacturer or vendor specifications for each burner subject to this condition. These specifications shall be kept at the source location and shall be made available for inspection by the Technical Secretary or his/her representative. The permittee shall be considered in compliance with this condition if the specifications for each burner indicate that NO<sub>x</sub> emissions from fuel combustion are no greater than 0.05 lb/MMBtu, when the burner operates at its design heat input capacity while burning natural gas. These specifications shall be retained for the life of the burner.

TAPCR 1200-03-07-.07(2)

**E4-5. Carbon monoxide emission limit**

CO emitted from this source shall not exceed **1.76 pounds per hour (lb/hr)** on a 24-hour averaging basis and **7.7 tons** during all intervals of 12 consecutive months.

TAPCR 1200-03-07.01(5), permit application dated November 23, 2009, and agreement letter dated May 13, 2004

**Compliance Method:** Compliance with this condition shall be assured by using only natural gas or propane as fuel and by fuel usage calculations. These calculations will be based on residence time and burn chamber capacity as appropriate. Assume an appropriate air to fuel ratio. Fuel usage is equal to fuel density multiplied by the air exhaust flow rate from the permit application and the residence time. Residence time equals burn chamber capacity divided by air flow rate. Units of time will be converted to hours and mass will be converted to pounds.

**E4-6. Particulate matter emission limit**

PM emitted from this source shall not exceed **1.36 pounds per hour (lb/hr)** on a 24-hour averaging basis and **6.0 tons** during all intervals of 12 consecutive months.

TAPCR 1200-03-07.01(5), permit application dated November 23, 2009, and permit 960151P Condition 5

**Compliance Method:** Compliance with this condition shall be assured by using only natural gas or propane as fuel and by fuel usage calculations. These calculations will be based on residence time and burn chamber capacity as appropriate. Assume an appropriate air to fuel ratio. Fuel usage is equal to fuel density multiplied by the air exhaust flow rate from the permit application and the residence time. Residence time equals burn chamber capacity divided by air flow rate. Units of time will be converted to hours and mass will be converted to pounds.

**E4-7. Fuel restrictions**

Only natural gas or propane shall be used as fuels for this source.

TAPCR 1200-03-07-.07(2)

**Compliance Method:** Compliance with this condition shall be assured by annual certification. Certifications shall be submitted in accordance with condition E2.

**E4-8. Operating Scenarios**

This source shall operate only in one of two operating scenarios. Scenario number 1 shall use the emissions control system without bypassing. Scenario number 2 allows press 30 to bypass while using water based coatings and all other presses use the emissions control system without bypassing.

**Compliance Method:** Compliance with this condition shall be assured by recordkeeping. The permittee shall clearly demonstrate, in a log with time and date, when the source is operating in scenario number 1, and therefore requiring the use of the add-on control system. While operating under scenario number 2, only press 30 is allowed to bypass the control device(s), RTOs. (Note: while operating under scenario number 2, press 30 uses water based coatings (inks) and it becomes unfeasible to exhaust emissions to the RTO due to low VOC concentrations. Therefore, press 30 emissions can bypass exhausting to the RTOs while operating under scenario number 2 only.) Enclosure monitoring and associated PTE requirements are not applicable to press 30 when in operating scenario 2. However, all permit conditions remain effective with reference to limitations, monitoring requirements, operating requirements, and recordkeeping requirements, as referenced in this permit, except as indicated in the revised CAM Plan. While operating under scenario number 1, all permit conditions, as referenced in this permit, are effective which also include the requirements associated with the CAM plan. The CAM plan dated September 28, 2006, and revised March 10, 2010, is incorporated into this permit by reference and included at Attachment 2.

**E4-9. Volatile Organic Compounds (VOC) and calculations for VOC and HAP emissions**

The permittee shall calculate the actual quantities of HAP(s) and VOC emitted from this source during each calendar month within thirty (30) days after the end of the month, and maintain records of these emissions in a permanent form that readily shows compliance with condition E3-5 of this permit. (See example below) This log must be maintained and kept available at this source location and kept available for inspection by the Technical Secretary or his/her representative. VOC emitted from this source shall be determined using the VOC usage/consumption rate obtained from the VOC usage record required and the overall VOC control efficiency specified in this condition.

Permit 960151P Table A1 and A2

$$W_{\text{voc, emitted}} = W_{\text{voc, used}} \times \left[ 1 - \frac{\eta_{\text{voc, overall}}}{100} \right]$$

Where:

$W_{\text{voc, used}}$  = Monthly VOC usage rate as described in this condition

$W_{\text{voc, emitted}}$  = VOC emitted from this source during any single month, ton/month;

$\eta_{\text{VOC, OVERALL}}$  = Overall VOC control efficiency for the VOC control system in weight percent

The VOC emission rate determined in this condition may be used to demonstrate compliance with condition E3-5 during any single month, provided that other permit conditions related to VOC content determination and/or documentation, VOC usage record, and VOC emission containment and control are met.

**MONTHLY VOC/HAP EMISSIONS LOG FOR SOURCE 37-0076-01**

Log A: MONTH: \_\_\_\_\_ YEAR: \_\_\_\_\_

MATERIAL NAME	USAGE (gallons per month (gpm) or lb/month)	VOC CONTENT (pounds VOC per gallon or lb <sub>VOC</sub> /lb <sub>INK</sub> )	$\eta_{VOC}$ , OVERALL (%)	VOC Emitted (tons VOC per month)	HAP <sub>1</sub> CONTENT (pounds HAP <sub>1</sub> per gallon or lb <sub>HAP</sub> /lb <sub>INK</sub> )	HAP <sub>1</sub> Emitted (tons HAP <sub>1</sub> per month)	HAP <sub>p</sub> CONTENT (pounds HAP <sub>p</sub> per gallon or lb <sub>HAP</sub> /lb <sub>INK</sub> )	HAP <sub>p</sub> Emitted (tons HAP <sub>p</sub> per month)	TOTAL HAP Emitted (tons HAP <sub>1</sub> through HAP <sub>p</sub> per month)
TOTAL				VOCE		HAP <sub>1</sub> E		HAP <sub>p</sub> E	THAPE

**YEARLY EMISSIONS LOG FOR SOURCE 37-0076-01: Log B:**

MONTH/ YEAR	VOC EMISSIONS (tons VOC per month)	*VOC EMISSIONS (tons VOC per 12 months)	HAP <sub>1</sub> EMISSIONS (tons HAP <sub>1</sub> per month)	*HAP <sub>1</sub> EMISSIONS (tons HAP <sub>1</sub> per 12 months)	HAP <sub>p</sub> EMISSIONS (tons HAP <sub>p</sub> per month)	*HAP <sub>p</sub> EMISSIONS (tons HAP <sub>p</sub> per 12 months)	TOTAL HAP EMISSIONS (tons HAP <sub>1</sub> through HAP <sub>p</sub> per month)	TOTAL HAP EMISSIONS (tons HAP <sub>1</sub> through HAP <sub>p</sub> per 12 months)
Month/year	VOCE	VOCE12	HAP <sub>1</sub> E	HAP <sub>1</sub> E12	HAP <sub>p</sub> E	HAP <sub>p</sub> E12	THAPE	THAPE12
Month/year	VOCE	VOCE12	HAP <sub>1</sub> E	HAP <sub>1</sub> E12	HAP <sub>p</sub> E	HAP <sub>p</sub> E12	THAPE	THAPE12
Month/year	VOCE	VOCE12	HAP <sub>1</sub> E	HAP <sub>1</sub> E12	HAP <sub>p</sub> E	HAP <sub>p</sub> E12	THAPE	THAPE12
Etc.	VOCE	VOCE12	HAP <sub>1</sub> E	HAP <sub>1</sub> E12	HAP <sub>p</sub> E	HAP <sub>p</sub> E12	THAPE	THAPE12

(\*) The Tons per 12 Month value is the sum of the VOC (or HAP) emissions in the 11 months preceding the month just completed plus the VOC (or HAP) emissions in the month just completed. If data is not available for the 11 months preceding the initial use of this log, this value will be equal to the value for tons per month. For the second month it will be the sum of the first month and the second month. Indicate in parentheses the number of months summed, that is, 6 (2) represents 6 tons emitted in 2 months.

VOC and HAPs emissions from this source shall be calculated and maintained by keeping the logs addressed in this condition.

$$\text{Control device Removal efficiency} = \frac{\left( \frac{\text{Mass emission rate of VOC going to control device} - \text{Mass emission rate of VOC from control device exhaust}}{\text{Mass emission rate of VOC going to control device}} \right) \times 100 \%}{\text{Mass emission rate of VOC going to control device}}$$

Where:

- (1) Control device removal efficiency = DRE
- (2) Mass emission rate of VOC = Mass of VOC emissions as measured by Method 25A
- (3) Overall Control Efficiency = (1 - 0.0115) x DRE
- (4) 0.0115 represents VOC fraction retained on substrate based on historical data from previous compliance demonstration at the Rogersville, Tennessee facility (similar facility of same ownership at the time).

**EQUATIONS FOR THE VOC/HAP EMISSIONS CALCULATIONS FOR SOURCE 37-0076-01:**

- (1) VOCE = VOC emitted (tons per month) =  $\sum \text{Material}_i \text{ Usage (gpm)} \times \text{Material}_i \text{ VOC content (pounds per gallon)} \times (1 - \text{OCE}) / 2000 \text{ pounds/ton}$
- (2) HAP<sub>1</sub>E = HAP<sub>1</sub> emitted (tons per month) =  $\sum \text{Material}_i \text{ Usage (gpm)} \times \text{HAP}_1 \text{ content (pounds per gallon)} \times (1 - \text{OCE}) / 2000 \text{ pounds/ton}$
- (3) HAP<sub>p</sub>E = HAP<sub>p</sub> emitted (tons HAP<sub>p</sub> per month) =  $\sum \text{Material}_i \text{ Usage (gpm)} \times \text{HAP}_p \text{ content (pounds per gallon)} \times (1 - \text{OCE}) / 2000 \text{ pounds/ton}$
- (4) THAPE = total tons per month of HAP Emissions =  $\sum \text{HAP}_1 \text{ through HAP}_p \text{ emitted (tons per month)}$
- (5) VOCE12 = total tons per 12 months of VOC Emissions =  $\sum \text{VOC emitted during 12 consecutive months}$

- (6)  $HAP_{iE12}$  = total tons per 12 months of  $HAP_{iE}$  Emissions =  $\Sigma HAP_{iE}$  emitted during 12 consecutive months
  - (7)  $HAP_{pE12}$  = total tons per 12 months of  $HAP_{pE}$  Emissions =  $\Sigma HAP_{pE}$  emitted during 12 consecutive months
  - (8)  $THAPE12$  = total tons per 12 months of HAP Emissions =  $\Sigma HAP_1$  through  $HAP_p$  emitted (tons per month)
  - (9)  $12VOCE$  = total VOC (tons per month) emitted by source
  - (10)  $12VOCE12$  = total VOC (tons per 12 consecutive months) emitted by source
  - (11)  $12THAP_{iE}$  = total  $HAP_{iE}$  (tons per month) emitted by source
  - (12)  $12THAP_{iE12}$  = total  $HAP_{iE}$  (tons per 12 consecutive months) emitted by source
  - (13)  $12HAP_{pE}$  = total  $HAP_{pE}$  (tons per month) emitted by source
  - (14)  $12HAP_{pE12}$  = total  $HAP_{pE}$  (tons per 12 months) emitted by source
  - (15)  $12THAPE$  = total HAP (tons per month) emitted by source
  - (16)  $12THAPE12$  = total HAP (tons per 12 months) emitted by source
- OCE = overall control efficiency of the control system for source 37-0076-01 (includes all presses and ancillary equipment).

Notes:

Both VOC and HAP emissions are calculated with the use of air pollution control equipment.

Actual emissions represent emissions after controls are considered.

#### E4-10. Compliance assurance monitoring (CAM) plan applicability

This source shall not operate without the use of the air pollution control devices (RTO #1 and/or RTO #2) unless operating in scenarios as described in condition E4-8. Air pollution control devices shall operate in accordance with the approved CAM plan.

TAPCR 1200-03-07-.07(2)

**Compliance Method:** Compliance with this condition shall be assured by recordkeeping. Recordkeeping requirements are detailed in the CAM plan, which is incorporated into this permit by reference. The plan may be revised but must have the Technical Secretary's written approval before it becomes effective and applicable. Once approved, the updated plan shall be incorporated into this permit by reference. It is included as Attachment 2. Reports and certifications shall be submitted in accordance with condition E2.

#### E4-11. Emission control device requirements

The overall control efficiency for source 37-0076-01 for VOC emissions shall not be less than 90%. Routine maintenance, as required to maintain 90% VOCs destruction efficiency for each source, shall be performed on the RTOs. The capture efficiency of the central air handling system at this facility shall be maintained at 100% while operating any associated process. The enclosure for the central air handling system at this facility shall meet the criteria for PTE as specified in 40 CFR Part 51, Appendix M, Method 204. The permittee shall use an alarm to notify operators of a possible upset condition. Within one hour of the alarm, the owner or operator will complete a system evaluation to determine the cause for the alarm. If no anomalies are noted and if within one hour the readings return to levels below those levels indicated above, no other action is necessary. Otherwise, the upset condition will be classified as a malfunction of the control system.

Permit 553946, Condition E4-3 through E4-12

TAPCR 1200-03-18-.04(3)(b)1(i), TAPCR 1200-03-10-.02(1)(a), TAPCR 1200-03-18-.03(5)(b)9.,

TAPCR 1200-03-18-.83(2)(b), TAPCR 1200-03-18-.03(5)(b), TAPCR 1200-03-07-.07(2), TAPCR 1200-03-10-.02(2)(a), TAPCR 1200-03-20-.01(1), and TAPCR 1200-03-18-.03(5)c)

**Compliance Method:** Compliance with this condition shall be assured by recordkeeping and use of air pollution control equipment. Recordkeeping requirements and pollution control equipment related operating parameters are outlined in (1), (2), and (3) below.

Compliance with the overall control efficiency of not less than 90% is achieved by effective use of the capture efficiency of the central air handling system and the proper use of the pollution control equipment. The parameters established during the most current performance test (conducted July 11-12, 2007) shall be incorporated into this permit by reference. Compliance with this CAM requirement is assured by compliance with condition E4-10.

Pursuant to Rule 1200-03-18-.03(5)(a) of the Air Pollution Control Regulations, the permittee shall determine a minimum operating temperature for each RTO during the performance test to demonstrate compliance with this condition. The performance test conducted July 11-12, 2007 establishes the minimum operating temperature of each RTO as 1490°F.

- (1) The owner or operator of this source shall record the following information each day for each printing line (printing press).
  - (a) A log of the operating time for the capture system and control device(s) while any printing line (printing press) is operational including makeup or make ready conditions;
  - (b) Information necessary for completion of Log A in condition E4-9; and
  - (c) Information detailed in the CAM plan requirements of condition E4-10, which includes control device monitoring data (i.e. thermocouple temperatures).
- (2) Routine maintenance, as required to maintain the 90% VOC destruction efficiency, shall be performed on the RTOs. Appropriate maintenance records shall be recorded in a suitable permanent form and kept available for inspection by the Technical Secretary or his/her representative. Upon the malfunction/failure of any emission control device(s) serving this source, the operation of the process(es) served by the device(s) shall be regulated by Chapter 1200-03-20 of the Tennessee Air Pollution Control Regulations.
- (3) The permittee shall notify the Technical Secretary of an instance of noncompliance with the applicable requirements for control devices (i.e. minimum operating temperature of 1490°F for each RTO), including any period of operation during which the parameter boundaries established during the performance test are exceeded, within 30 calendar days following the occurrence.

37-0076-02	<b>Source Identification</b> :	<b>Waste Paper Handling Operation with two Balers and Baghouse Control:</b> Waste paper is collected by a collection system and sent to the paper balers. A separator is used to separate large waste from small particles resulting from the trimming operations conducted during the course of the packaging rotogravure printing process. The small particles are routed through a 7200 scfm baghouse and exhausted inside the building.
------------	-----------------------------------	---

**E5. Conditions specific to source 37-0076-02.****E5-1. Process input restriction**

The process input rate for the Waste Paper Handling Operation shall not exceed a maximum of 1,600 pounds per hour based on an 8-hour average.

TAPCR 1200-03-09 and agreement letter dated October 23, 2007

**Compliance Method:** Compliance with this condition shall be assured by annual certification. Certifications shall be submitted in accordance with condition E2.

**E5-2. Particulate Matter (PM) emission limit**

PM emitted from this source shall not exceed a maximum of 2.2 pounds per hour and 9.6 tons per year.

TAPCR 1200-03-07-.01(5), TAPCR 1200-03-07-.03(1), and the agreement letter dated October 23, 2007

**Compliance Method:** Compliance with the PM limitation shall be assured by proper maintenance of the control system. A monthly log of inspection and maintenance shall indicate what maintenance and repair activity was done, when it was done, and when problems were rectified, showing time and date. This information shall include, but is not limited to, baghouse inspections and repairs. A log of the operation hours when this process is operating without the control system fully operating must be kept. The days when the source does not operate shall be noted. These logs shall be retained in accordance with condition B2. Monthly log entries shall be reported in accordance with condition E2.

---

**END OF PERMIT NUMBER: 572143**

---

---

**ATTACHMENT 1**

---

OPACITY MATRIX DECISION TREE for VISIBLE EMISSION  
EVALUATION

**EPA METHOD 9**

dated JUNE 18, 1996 and amended September 11, 2013

---

### Decision Tree PM for Opacity for Sources Utilizing EPA Method 9\*

#### Notes:

PM = Periodic Monitoring required by 1200-03-09-.02(11)(e)(iii).

This Decision Tree outlines the criteria by which major sources can meet the periodic monitoring and testing requirements of Title V for demonstrating compliance with the visible emission standards set forth in the permit. It is not intended to determine compliance requirements for EPA's Compliance Assurance Monitoring (CAM) Rule (formerly referred to as Enhanced Monitoring – Proposed 40 CFR 64).

Examine each emission unit using this Decision Tree to determine the PM required.\*

Use of continuous emission monitoring systems eliminates the need to do any additional periodic monitoring.

Visible Emission Evaluations (VEEs) are to be conducted utilizing EPA Method 9. The observer must be properly certified to conduct valid evaluations.

Typical Pollutants  
Particulates, VOC, CO, SO<sub>2</sub>, NO<sub>x</sub>, HCl, HF, HBr, Ammonia, and Methane.

Initial observations are to be repeated within 90 days of startup of a modified source, if a new construction permit is issued for modification of the source.

A VEE conducted by TAPCD personnel after the Title V permit is issued will also constitute an initial reading.

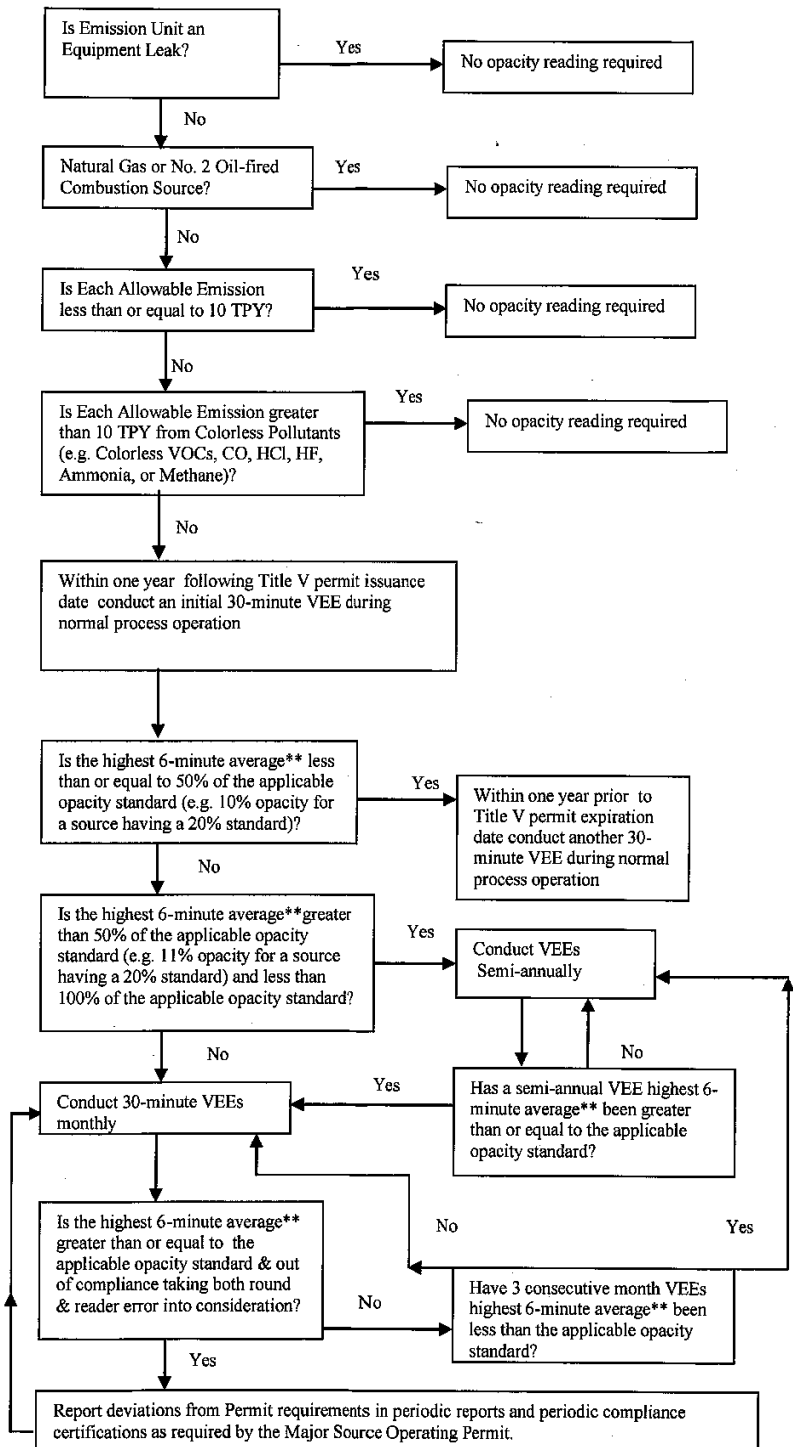
Reader Error  
EPA Method 9, Non-NSPS or NESHAPS stipulated opacity standards:  
The TAPCD guidance is to declare non-compliance when the highest six-minute average\*\* exceeds the standard plus 6.8% opacity (e.g. 26.8% for a 20% standard).

EPA Method 9, NSPS or NESHAPS stipulate opacity standards:  
EPA guidance is to allow only engineering round. No allowance for reader error is given.

\*Not applicable to Asbestos manufacturing subject to 40 CFR 61.142

\*\*Or second highest six-minute average, if the source has an exemption period stipulated in either the regulations or in the permit.

Dated June 18, 1996  
Amended September 11, 2013



Permit Number: 572143

Expiration Date: draft

**ATTACHMENT 2**

---

**CAM Plan**

Revision dated March 15, 2010

---

Permit Number: 572143

Expiration Date: draft

See attachment for complete CAM plan